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BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:21-cv-00893-JCM-VCF

**STIPULATION AND  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 6] AND MOTION FOR FEES AND  
COSTS [ECF No. 7]**

**(First Request)**



Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Bank of America, N.A. (“BANA”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On May 6, 2021, BANA filed its Complaint in the Second Judicial District Court, Case No. A-21-834244-C [ECF No. 1-1];
2. On May 6, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On June 4, 2021, BANA filed a Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7];
4. Chicago Title’s deadline to respond to BANA’s Motion for Remand and Motion for Costs and Fees is June 18, 2021;
5. Chicago Title’s counsel is requesting an extension until July 9, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
6. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in Bayview’s motions;
7. BANA does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to BANA's Motion for  
2 Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended through and  
3 including July 9, 2021.

4  
5 Dated: June 17, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: June 17, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

14 Dated: June 17, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Christina V. Miller  
16 CHRISTINA V. MILLER  
17 Attorneys for Plaintiff BANK OF AMERICA,  
N.A.

18 **IT IS SO ORDERED:**

19  
20 Dated: June 18, 2021

21 By:   
22 UNITED STATES DISTRICT COURT JUDGE  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

